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February 6, 2020

**By CM/ECF**

The Chambers of the Honorable Judge LaShann DeArcy Hall  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *Elliott v. Donegan, et al.*, No. 1:18-civ-05680-LDH-SJB

Dear Judge DeArcy Hall,

On behalf of Defendant Moira Donegan, we write to provide the Court with notice of additional sources of media coverage on Plaintiff Stephen Elliott published prior to the filing of this case that are relevant to the issue to be discussed tomorrow at oral argument, namely “the single issue of whether Plaintiff was or was not a limited-purpose public figure.”

- Ellen Warren, *Stories of a Troubled Man*, Chicago Tribune, Mar. 18, 2005, <https://www.chicagotribune.com/nation-world/chi-050427elliott-story.html> (attached as Exhibit A)
- Donna Minkowitz, *The Softer Side of S/M*, Salon, Nov. 29, 2006, [https://www.salon.com/2006/11/29/elliott\\_6/](https://www.salon.com/2006/11/29/elliott_6/) (attached as Exhibit B)
- Mirka Hodurova, *Moods, Masochism, and Murder: A Conversation*, The Cult, Jul. 15, 2009, <https://chuckpalahniuk.net/interviews/stephen-elliott> (attached as Exhibit C)
- Gina Frangello, *The Most Together Fucked-Up Guy in the Universe: A Conversation with Stephen Elliott*, The Nervous Breakdown, Aug. 27, 2010 <http://thenervousbreakdown.com/gfrangello/2010/08/the-most-together-fucked-up-guy-in-the-universe-a-conversation-with-stephen-elliott/> (attached as Exhibit D)

We expect to discuss the above articles, along with those listed in the Appendix to our Reply Memorandum in support of our Motion to Dismiss (*see* ECF 45 at 12-21), at oral argument tomorrow.

Respectfully Submitted,



Roberta A. Kaplan, Esq.  
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*Counsel for Defendant Moira Donegan*